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Attorney for Material Witnesses

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**  
**(Magistrate Judge Louisa S. Porter)**

UNITED STATES OF AMERICA;	)	Criminal Case No: 08cr1553WQH
	)	Magistrate Case No.:01422-POR
Plaintiff,	)	
vs.	)	<b>MOTION FOR MATERIAL</b>
	)	<b>WITNESSES' VIDEOTAPED</b>
	)	<b>DEPOSITION</b>
HUMBERTO GONZALEZ-HERNANDEZ,	)	DATE: June 10, 2008
	)	TIME: 2 pm
Defendant.	)	HON: Louisa S. Porter
	)	
	)	

TO UNITED STATES ATTORNEY KAREN P. HEWITT OR HER REPRESENTATIVE, TO  
ATTORNEY, FEDERAL DEFENDERS FOR DEFENDANT HUMBERTO GONZALEZ-HERNANDEZ:  
NOTICE IS HEREBY GIVEN that on June 10, 2008 at 2 pm, or as soon thereafter as the matter may be  
heard, in the courtroom of Honorable Louisa S. Porter of this court, located at 940 Front Street, San Diego,  
California 92101, Material Witnesses Juan Gonzalez-Valdez and Angel Abraham Sanchez-Garcia by and  
through their attorney of record, Linda A. King, will move the court for an order authorizing the  
videotaped deposition of the material witnesses.

1 The motion will be made on the ground that there is good cause for the order requested in that the  
2 material witnesses know of no sureties in this country who will bond them out of US Marshall's Custody  
3 during the pendency of this matter. Neither the interests of justice nor the convenience of the parties and  
4 witnesses will be served by requiring the material witnesses to remain in Marshall's Custody until the  
5 matter is concluded.

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7  
8 Date: May 21, 2008

9 S/Linda A. King  
10 Linda A. King  
11 Attorney for Material Witnesses  
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